

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

RALPH “TREY” JOHNSON,  
STEPHANIE KERKELES,  
NICHOLAS LABELLA  
CLAUDIA RUIZ,  
JACOB WILLEBEEK-LEMAIR,  
ALEXA COOKE,  
RHESA FOSTER,  
ZACHARY HARRIS,  
MATTHEW SCHMIDT,  
TAMARA SCHOEN STATMAN,  
GINA SNYDER,  
ESTEBAN SUAREZ, and  
LIAM WALSH,  
individually and on behalf of all persons  
similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION, a/k/a the NCAA, and the  
following NCAA Division I Member Schools  
as representatives of a Defendant Class of all  
private and semi-public NCAA Division I  
Member Schools:

CORNELL UNIVERSITY,  
FORDHAM UNIVERSITY,  
LAFAYETTE COLLEGE,  
SACRED HEART UNIVERSITY,  
VILLANOVA UNIVERSITY,  
UNIVERSITY OF OREGON,  
TULANE UNIVERSITY,  
UNIVERSITY OF NOTRE DAME,  
UNIVERSITY OF ARIZONA,  
PURDUE UNIVERSITY,  
DUKE UNIVERSITY, and  
MARIST UNIVERSITY,

Defendants.

Case No. 2:19-cv-5230 (JP)

**JOINT STIPULATION  
AND  
[PROPOSED] ORDER**

**WHEREAS**, Defendants National Collegiate Athletic Association (“NCAA”), Cornell University, Fordham University, Lafayette College, Sacred Heart University, Villanova University, University of Oregon, Tulane University, University of Notre Dame, University of Arizona, Purdue University, Duke University, and Marist University (collectively, “Defendants”) filed motions to dismiss the Third Amended Complaint on March 24, 2025;

**WHEREAS**, the current deadline for Plaintiffs Ralph “Trey” Johnson, Stephanie Kerkeles, Nicholas Labella, Claudia Ruiz, Jacob Willebeek-Lemair, Alexa Cooke, Rhesa Foster, Zachary Harris, Matthew Schmidt, Tamara Schoen Statman, Gina Snyder, Esteban Suarez, and Liam Walsh (collectively, “Plaintiffs,” and together with Defendants, the “Parties”) to file their responses to Defendants’ motions to dismiss is May 23, 2025;

**WHEREAS**, the current deadline for Defendants to file their reply briefs in support of their motions to dismiss is July 7, 2025;

**WHEREAS**, the current deadline for Plaintiffs to file their sur-reply briefs in opposition to Defendants’ motions to dismiss is August 6, 2025;

**WHEREAS**, Plaintiffs have requested that Defendants agree to extend the remaining deadlines in the current briefing schedule by forty-five (45) days;

**WHEREAS**, Defendants do not oppose Defendants’ requested extensions;<sup>1</sup>

**WHEREAS**, Plaintiffs and Defendants agree that extending the current deadlines in the briefing schedule by forty-five (45) days is desirable for all Parties and would benefit the Court;

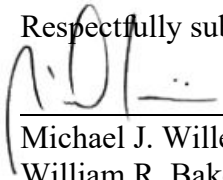
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<sup>1</sup> In joining this stipulation, Defendants expressly preserve all rights, claims, and available defenses. The Parties’ joint stipulation does not constitute any Defendant’s waiver of any right, claim, or available defense, including any and all defenses available under Rule 12 of the Federal Rules of Civil Procedure.

**THEREFORE, IT IS HEREBY STIPULATED AND AGREED,** by and between the undersigned attorneys for the Parties, that Plaintiffs' time to oppose Defendants' motions to dismiss is hereby extended up to and including July 7, 2025. Defendants shall file their reply briefs, if any, on or before August 21, 2025, and Plaintiffs shall file their sur-reply briefs, if any, on or before September 22, 2025.

DATED: May 16, 2025

Respectfully submitted,

  
Michael J. Willemin (admitted *pro hac vice*)

William R. Baker (admitted *pro hac vice*)

WIGDOR LLP

85 Fifth Avenue

New York, NY 10003

Telephone: (212) 257-6800

Facsimile: (212) 257-6845

mwillamin@wigdorlaw.com

wbaker@wigdorlaw.com

Paul L. McDonald (Pa. Bar No. 84856)

P L MCDONALD LAW LLC

1800 JFK Boulevard, Suite 300

Philadelphia, PA 19103

Telephone: (267) 238-3835

Facsimile: (267) 238-3801

paul@plmcdonaldlaw.com

*Counsel for Plaintiffs and  
Proposed Counsel for the Members of  
the Proposed FLSA Collective,  
the Proposed Pennsylvania Class,  
the Proposed New York Class,  
the Proposed Connecticut Class,  
the Proposed North Carolina Class,  
the Proposed Oregon Class,  
the Proposed Louisiana Class,  
the Proposed Arizona Class, and  
the Proposed Indiana Class*

/s/ Todd A. Noteboom

Todd A. Noteboom (Pa. Bar No. 308557)

Tracey Holmes Donesky (admitted *pro hac vice*)

David P. Thoreson (admitted *pro hac vice*)

STINSON LLP

50 South Sixth Street, Suite 2600

Minneapolis, MN 55402

Telephone: (612) 335-1500

Facsimile: (612) 335-1657

todd.noteboom@stinson.com

tracey.donesky@stinson.com

david.thoreson@stinson.com

Naima S. Starks (admitted *pro hac vice*)

STINSON LLP

1775 Pennsylvania Avenue, NW

Suite 800

Washington, DC 20006

Telephone: (202) 785-9100

naima.starks@stinson.com

Steven B. Katz (admitted *pro hac vice*)

CONSTANGY, BROOKS, SMITH &  
PROPHETY, LLP

2029 Century Park East, Suite 1100

Los Angeles, CA 90067

Telephone: (310) 909-7775

Facsimile: (424) 465-6630

skatz@constangy.com

*Counsel for Defendant National Collegiate  
Athletic Association*

/s/ Alison H. Silveira

Alison H. Silveira (admitted *pro hac vice*)  
SEYFARTH SHAW LLP  
Two Seaport Lane, Suite 1200  
Boston, MA 02210  
Telephone: (617) 946-4800  
Facsimile: (617) 946-4801  
asilveira@seyfarth.com

Lilah Wylde (admitted *pro hac vice*)  
SEYFARTH SHAW LLP  
560 Mission Street, Suite 3100  
San Francisco, CA 94105  
Telephone: (415) 397-2823  
Facsimile: (415) 397-8549  
lwylde@seyfarth.com

Jacob Oslick (Pa. Bar No. 311028)  
SEYFARTH SHAW LLP  
620 Eighth Avenue, 32nd Floor  
New York, NY 10018  
Telephone: (212) 218-5500  
Facsimile: (212) 218-5526  
joslick@seyfarth.com

*Counsel for Defendant Marist University*

/s/ Kevin J. Mangan

Kevin J. Mangan (Pa. Bar No. 56507)  
WOMBLE BOND DICKINSON LLP  
1313 North Market Street, Suite 1200  
Wilmington, DE 19801  
Telephone: (302) 252-4320  
kevin.mangagn@wbd-us.com

James P. Cooney III (admitted *pro hac vice*)  
WOMBLE BOND DICKINSON LLP  
301 South College Street, Suite 3500  
Charlotte, NC 28202  
Telephone: (704) 331-4980  
jim.cooney@wbd-us.com

*Counsel for Defendant Duke University*

/s/ Trenten D. Klingerman

Trenten D. Klingerman (admitted *pro hac vice*)  
William P. Kealey (admitted *pro hac vice*)  
STUART & BRANIGIN LLP  
300 Main Street, Suite 900  
Lafayette, IN 47902-1010  
Telephone: (765) 423-1561  
tdk@stuartlaw.com  
wpk@stuartlaw.com

*Counsel for Defendants Purdue University  
and University of Oregon*

/s/ Marla N. Presley

Marla N. Presley (Pa. Bar No. 91020)  
Katelyn M. O'Connor (Pa. Bar No. 308922)  
JACKSON LEWIS P.C.  
1001 Liberty Avenue, Suite 1000  
Pittsburgh, PA 15222  
Telephone: (412) 338-5148  
Facsimile: (412) 232-3441  
marla.presley@jacksonlewis.com  
katie.o'connor@jacksonlewis.com

*Counsel for Defendant University of  
Arizona*

/s/ Steven W Schlesinger

Steven W Schlesinger (Pa. Bar No. 332869)  
Mark A. Konkel (admitted *pro hac vice*)  
Sandra L. Musumeci (admitted *pro hac vice*)  
KELLEY DRYE & WARREN LLP  
3 World Trade Center  
175 Greenwich Street  
New York, NY 10007  
Telephone: (212) 808-7800  
Facsimile: (212) 808-7897  
sschlesinger@kelleydrye.com  
mkonkel@kelleydrye.com  
smusumeci@kelleydrye.com

*Counsel for Defendant Fordham University*

/s/ Julie A. Busta

Julie A. Busta (Pa. Bar No. 311933)  
AKIN GUMP STRAUSS HAUER &  
FELD LLP  
1735 Market Street, 12th Floor  
Philadelphia, PA 19103  
Telephone: (215) 965-1260  
Facsimile: (215) 965-1210  
jbusta@akingump.com

Anthony T. Pierce (admitted *pro hac vice*)  
Katherine I. Heise (admitted *pro hac vice*)  
AKIN GUMP STRAUSS HAUER &  
FELD LLP  
2001 K Street, N.W.  
Washington, DC 20006  
Telephone: (202) 887-4000  
Facsimile: (202) 887-4288  
apierce@akingump.com  
kheise@akingump.com

Jessica Taub Rosenberg (admitted *pro hac vice*)  
AKIN GUMP STRAUSS HAUER &  
FELD LLP  
1 Bryant Park, Bank of America Tower  
New York, NY 10036  
Telephone: (212) 872-1000  
Facsimile: (212) 872-1002  
jrosenberg@akingump.com

*Counsel for Defendant Cornell University*

/s/ Rebecca Sha

Rebecca Sha (admitted *pro hac vice*)  
Stephanie M. Poucher (admitted *pro hac vice*)  
PHELPS DUNBAR LLP  
Canal Place  
365 Canal Street, Suite 2000  
New Orleans, LA 70130  
Telephone: (504) 566-1311  
Facsimile: (504) 568-9130  
rebecca.sha@phelps.com  
stephanie.poucher@phelps.com

John L. Lamb, Esq. (Pa. Bar No. 324291)  
Joseph J. Centeno, Esq. (Pa. Bar No. 70902)  
BUCHANAN INGERSOLL & ROONEY  
PC  
Two Liberty Place  
50 South 16th Street, Suite 3200  
Philadelphia, PA 19102-2555  
Telephone: (215) 665-8700  
john.lamb@bipc.com  
joseph.centeno@bipc.com

*Counsel for Defendant Administrators of  
the Tulane Educational Fund (Tulane  
University)*

/s/ Sean P. Fahey

Sean P. Fahey (Pa. Bar No. 73305)  
Christopher J. Moran (Pa. Bar No. 68142)  
Brian R. Ellixson (Pa. Bar No. 319083)  
TROUTMAN PEPPER LOCKE LLP  
3000 Two Logan Square, 18th & Arch  
Streets  
Philadelphia, PA 19103  
Telephone: (215) 981-4000  
sean.fahey@troutman.com  
christopher.moran@troutman.com  
brian.ellixson@troutman.com

*Counsel for Defendants Lafayette College,  
Sacred Heart University, and  
Villanova University*

/s/ Mark J. Neuberger

Mark J. Neuberger (Pa. Bar No. 49714)  
FOLEY & LARDNER LLP  
2 South Biscayne Blvd., Suite 1900  
Miami, FL 33131  
Telephone: (305) 482-8408  
Facsimile: (305) 482-8600  
mneuberger@foley.com

Jonathan L. Israel (admitted *pro hac vice*)  
FOLEY & LARDNER LLP  
90 Park Avenue  
New York, NY 10013  
Telephone: (212) 338-3610  
Facsimile: (212) 687-2329  
jisrael@foley.com

*Counsel for Defendant*  
*University of Notre Dame du Lac*

**ORDER**

Pursuant to the above stipulation, **IT IS SO ORDERED.**

Dated:

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The Honorable John R. Padova  
United States District Judge